

BEFORE THE
UNITED STATES OF AMERICA
POSTAL REGULATORY COMMISSION
WASHINGTON, DC 20268-0001

Competitive Product Prices
Inbound Parcel Post (at UPU Rates)

Docket No. CP2017-267

PUBLIC REPRESENTATIVE COMMENTS ON CHANGES IN PRICES
FOR INBOUND PARCEL POST (AT UPU RATES)

(August 23, 2017)

The Public Representative hereby provides comments pursuant to Notice Initiating Docket(s) for Recent Postal Service Negotiated Service Agreement Filings.¹ In that Notice, the Commission established the above referenced docket to receive comments from interested persons, including the undersigned Public Representative, on a Postal Service Notice of a change in rates not of general applicability for the Inbound Parcel Post (at UPU Rates) product.²

Included as Attachment 1 to the PS Notice is an application for non-public treatment of materials filed under seal. The Postal Service's proposed new rates for ECOMPRO appear within Attachment 2 filed under seal. The PS Notice also includes a certification pursuant to 39 C.F.R. § 3015.5(c)(2) as Attachment 3 and Redacted copies of Governors' Decision Nos. 14-04 and 11-6 are included as Attachments 4 and 5, respectively.

If approved, the Postal Service's proposed rates for ECOMPRO are intended to go into effect in January 2018. PS Notice at 1. The deadline for Postal Service to give notice of its new rates to the UPU is August 31, 2017. *Id.*

COMMENTS

Pursuant to 39 U.S.C. § 3633(a), the Postal Service's competitive prices must not result in the subsidization of competitive products by market dominant products; ensure that each

¹ Notice Initiating Docket(s) for Recent Postal Service Negotiated Service Agreement Filings, August 16, 2017.

² Notice of the United States Postal Service of Filing Changes in Rates Not of General Applicability for Certain Inbound Parcel Post (at UPU Rates), and Application for Non-Public Treatment, August 23, 2017. (PS Notice)

competitive product will cover its attributable costs; and, ensure that all competitive products collectively contribute an appropriate share of the institutional costs of the Postal Service.

Based upon a review of the financial data, the prices for ECOMPRO do not impede the Inbound Parcel Post (at UPU Rates) product from generating sufficient revenues to cover costs and therefore meet the requirements of 39 U.S.C. § 3633(a).

CONCLUSION

The Public Representative recommends that the Commission approve the change in rates for Inbound Parcel Post (at UPU Rates).

The Public Representative respectfully submits the foregoing comments for the Commission's consideration.

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